



May 27, 2022

District Judge Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

By Electronic Filing.

Re: Carol Lopez v. City of New York, et al., 20-cv-2502-LJL

Dear Judge Liman:

My firm represents the Plaintiff in this matter. I write jointly with Defendants to ask for an extension of the current discovery schedule. This is the third such motion.

By way of background, the Court previously granted two extensions — and Defendants currently have a combination motion to dismiss and motion to stay *Monell* discovery pending. Plaintiff has not moved to compel *Monell* discovery in light of that motion, but no *Monell* discovery has been exchanged. Additionally, Plaintiff very recently had a knee surgery related to this incident, and the parties are in the process of obtaining and exchanging related records and releases.

With that background, we suggest that the Court enter a contingent extension — shifting the current discovery schedule out *sine die*, to be solidified based on the resolution of Defendants' motion to stay and dismiss. Following that order, the parties will quickly consult and file a proposed new schedule.

As always, we thank the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their them

COHEN&GREEN P.L.L.C.

1639 Centre St., Suite 216
Ridgewood, New York 11385

cc:

All relevant parties by ECF and Email.